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Attorneys for Defendants VECTOR MARIETING CORPORATION

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

ALICIA HARRIS, as an individual and on
behalf of all others similarly situated,

Plaintiffs,
vs.

VECTOR MARKETING CORPORATION, a
Pennsylvania corporation; and DOES 1 through
20, inclusive,

Defendants.

Case No.: CV 08 5198 EMC

**JOINT STIPULATION AND [PROPOSED]
ORDER STAYING OBLIGATION UNDER
SUBPOENA PENDING DISPOSITION OF
PLAINTIFF'S MOTION TO QUASH**

Assigned to the Hon. Edward M. Chen,
Courtroom C

ADDITIONAL PLAINTIFF'S COUNSEL

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1 Plaintiff Alicia Harris ("Plaintiff") and defendant, Vector Marketing Corp.
2 ("Defendant"), by and through their counsel of record, hereby stipulate and agree as follows:

3 WHEREAS, Defendant served subpoenas upon Pasadena High School, CIS Academy,
4 Pasadena City College, and John Muir High School seeking production of records relating to
5 Plaintiff's academic performance and evaluations, transcript of grades and course enrollment,
6 dates of enrollment, attendance, any academic diagnostic examinations and examination scores,
7 and any education, academic proficiency, or other related testing administered to Plaintiff.

8 WHEREAS, Plaintiff intends to promptly file a Motion to Quash said subpoenas.

9 WHEREAS, the filing of a Motion to Quash does not stay obligations of recipients to
10 comply with their obligations under a subpoena.

11 WHEREAS, the Court's disposition of Plaintiff's Motion to Quash could affect the
12 parties' obligations under the subpoena.

13 WHEREAS, Plaintiff's counsel and Defendant's counsel believes it is in their mutual
14 best interests to stay Pasadena High School, CIS academy, Pasadena City College, and John
15 Muir High School's obligations pursuant to the subpoena, for a period of time not to exceed
16 forty-five days from the date of the entry of the proposed order herein.

17 NOW THEREFORE, IT IS HEREBY STIPULATED by the parties herein, through their
18 counsel of record, as follows:

19 (1) The date for production of the documents requested in the subpoenas to Pasadena
20 High School, CIS academy, Pasadena City College, and John Muir High School shall
21 be stayed pending the Court's disposition of Plaintiff's Motion to Quash, for a period
22 of time not to exceed forty-five days from the date of the entry of the proposed order
23 herein. The Parties will notify the recipients of the subpoenas immediately following
24 the Court's issuance of its Order on the Motion to Quash, as to whether compliance is
25 still required, and if so, on what date compliance is to be completed;

26 ///

27 ///

1 (2) Plaintiff will file her motion to quash on or before June 4, 2010.

2 IT SO STIPULATED.

3
4 Dated: May 27, 2010

MARLIN & SALTZMAN

5
6 By: /S/
7 Christina A. Humphrey, Esq.
8 Attorneys for Plaintiff

9 Dated: May 27, 2010

REED SMITH, LLP

10
11 By: /S/
12 Roxanne M. Wilson, Esq.
13 Attorneys for Defendant

14 I, Christina A. Humphrey, attest that I have obtained concurrence from Roxanne M.
15 Wilson in the filing of this Stipulation. See N.D. Cal. General Order 45 § 10(B).

16 **[PROPOSED] ORDER**

17
18
19 GOOD CAUSE APPEARING, IT IS SO ORDERED,

20
21 DATED: June 1, 2010

